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## *Counsel for Federal Defendants*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT CALIFORNIA  
WESTERN DIVISION**

CENTER FOR BIOLOGICAL  
DIVERSITY; WISHTOYO  
FOUNDATION,

*Plaintiffs,*

V.

DEBRA HAALAND, et al.,

## *Federal Defendants*

and

## SABLE OFFSHORE CORP.

### *Intervenor-Defendant.*

Case No. 2:24-cv-05459-MWC-  
MAA

**DECLARATION OF  
DANIEL C. LUECKE IN  
SUPPORT OF  
STIPULATION TO  
CONTINUE HEARING  
DATE**

Honorable Michelle Williams  
Court  
United States District Judge

1 I, Daniel C. Luecke, declare as follows:

2 1. I am counsel for Defendants Debra Haaland, in her official capacity as  
3 Secretary of the U.S. Department of the Interior; Bruce Hesson, in his official  
4 capacity as Pacific Regional Director for the Bureau of Safety and Environmental  
5 Enforcement (“BSEE”); and BSEE (“Federal Defendants”). In support of Plaintiffs  
6 Center for Biological Diversity and Wishtoyo Foundation, Federal Defendants, and  
7 Intervenor-Defendant Sable Offshore Corp.’s (“Parties”) Stipulation to Continue  
8 Hearing Date, and consistent with the Court’s Standing Order and Civil Trial  
9 Order, Dkts. 34 & 36, I state as follows:

10 2. The complaint in this matter was filed on June 24, 2024. Service was  
11 completed on the United States Attorney’s Office on July 8, 2024, making Federal  
12 Defendants’ answer deadline September 6, 2024. Federal Defendants filed their  
13 answer on September 6, 2024. Dkt. 12.

14 3. On September 6, 2024, the Court issued an order requiring Plaintiffs and  
15 Federal Defendants to file a Joint Rule 26(f) report by October 3, 2024. Dkt. 13.  
16 Counsel for Plaintiffs and Federal Defendants submitted their Joint Rule 26(f)  
17 report on October 3, 2024, proposing a schedule that would resolve this case  
18 through motions practice without the need for discovery or a trial. Dkt. 14 at 5, 7.

19 5. Consistent with the previous Case Management Order, Dkt. 17, Federal  
20 Defendants lodged the administrative record with the Court on November 8, 2024,  
21 Dkt. 31.

22 6. On November 12, 2024, this case was transferred to the Honorable Judge  
23 Michelle Williams Court. Dkt. 32.

24 7. After conferring with counsel for Plaintiffs and Intervenor-Defendant,  
25 Federal Defendants filed their Motion for Voluntary Remand on December 20,  
26 2024. Dkt. 37.

27 8. After conferring with counsel for Federal Defendants and Intervenor-

1 Defendant, Plaintiffs filed their Motion for Leave to File First Supplemental and  
2 Amended Complaint on January 3, 2025. Dkt. 38.

3 9. On January 8, 2025, after reviewing Plaintiffs' Motion for Leave to File  
4 First Supplemental and Amended Complaint, I conferred with relevant federal  
5 stakeholders. On January 13, 2025, I received confirmation that Federal  
6 Defendants would take no position on Plaintiffs' motion.

7 11. In light of Plaintiffs' motion, after conferring with relevant federal  
8 stakeholders, I determined that there is good cause for requesting a continuance of  
9 further briefing and argument on Federal Defendants' pending motion. In the  
10 potential event Plaintiffs' pending motion is granted, in whole or in part, Federal  
11 Defendants would need to determine whether to alter the scope of the requested  
12 remand to encompass Plaintiffs' new claims. If Federal Defendants decide to also  
13 seek remand of new claims, a new motion and additional briefing would be  
14 required. However, the hearing on Federal Defendants' pending Motion for  
15 Voluntary Remand is currently noticed for an earlier date than the hearing on  
16 Plaintiffs' Motion for Leave to File First Supplemental and Amended Complaint.  
17 A continuance would allow the issue of amendment to be resolved first so the  
18 Parties can determine the nature and number of Plaintiffs' claims and avoid  
19 duplicative filings and oral arguments and procedural complexity. After that is  
20 resolved, the issue of voluntary remand could be addressed with certainty and  
21 efficiency.

22 12. In the afternoon on January 14, 2025, I conferred with counsel for  
23 Intervenor-Defendant regarding continuing the hearing date and further deadlines  
24 related to Federal Defendants' Motion for Voluntary Remand. Counsel with  
25 Intervenor-Defendant informed me that they needed to confer with their client  
26 regarding a continuance. Counsel with Intervenor-Defendant also informed me that  
27 Intervenor-Defendant will oppose Plaintiffs' Motion for Leave to File First

1 Supplemental and Amended Complaint.

2       13. In the morning on January 15, 2025, I contacted counsel for Plaintiffs  
3 regarding continuing the hearing date and further deadlines related to Federal  
4 Defendants' Motion for Voluntary Remand. Counsel for Plaintiffs were unable to  
5 confer that day. We therefore conferred on January 16, 2025. Counsel for Plaintiffs  
6 informed me that they stipulate to, and believe good cause exists for, the requested  
7 continuance.

8       14. On January 16, 2025, counsel for Intervenor-Defendant informed me  
9 that Intervenor-Defendant stipulates to, and believes good cause exists for, the  
10 requested continuance.

11       15. This is the Parties' first request for a continuance in this matter.

12       16. I declare under penalty of perjury that the foregoing is true and correct.

14 Executed this 16<sup>th</sup> day of January, 2025.



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16 Daniel C. Luecke  
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18 *Counsel for Federal Defendants*  
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